

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

**WILSON OCHAR,**

**Plaintiff,**

**v.**

**APPLE FEDERAL CREDIT UNION,**

**Defendant.**

**Civil Action No.: 24-757**

**NOTICE OF REMOVAL**

Defendant Apple Federal Credit Union (“Credit Union”), by counsel, hereby removes Case No. CL-2024-0005466 from the Circuit Court for Fairfax County, Virginia, to the United States District Court for the Eastern District of Virginia (Alexandria Division) pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, and as grounds for removal states as follows:

**STATEMENT OF THE CASE**

1. On April 15, 2024, Plaintiff Wilson Ochar filed a Complaint in the Circuit Court for Fairfax County, Virginia, styled Wilson Ochar v. Apple Federal Credit Union, Case No. CL-2024-0005466 (the “State Court Action”).

2. The Complaint asserts unspecified counts, but includes allegations of discrimination in mortgage lending on the basis of race and familial status in violation of federal fair lending laws, including the Fair Housing Act (Title VIII of the Civil Rights Act of 1968) and the Equal Credit Opportunity Act.

3. The Credit Union was served through personal service on April 16, 2024.

**FEDERAL QUESTION JURISDICTION UNDER 28 U.S.C. § 1331**

4. This Court has jurisdiction over this matter under 28 U.S.C. § 1331 because Plaintiff brings claims under Title VIII of the Civil Rights Act of 1968 (42 U.S.C. § 3601 *et seq.*) and the Equal Credit Opportunity Act (15 U.S.C. § 1691, *et seq.*).

**ALL PROCEDURAL REQUIREMENTS  
FOR REMOVAL HAVE BEEN SATISFIED**

5. Pursuant to 28 U.S.C. § 1446(a), a true and correct copy of all of the process, pleadings, orders and documents from the State Court Action are being filed with this Notice of Removal and are attached hereto as Exhibit A. Defendant will file a Notice of Filing of Notice of Removal with the Fairfax County Circuit Court, a copy of which is attached hereto as Exhibit B.

6. This Notice of Removal is timely in accordance with 28 U.S.C. § 1446(b) as this Notice is being filed within 30 days of service on the Credit Union.

7. Venue is proper in this court because the U.S. District Court for the Eastern District of Virginia (Alexandria Division) is the federal judicial district encompassing the Fairfax County Circuit Court where the State Court Action was originally filed.

**CONCLUSION**

By this Notice of Removal, the Credit Union does not waive any defenses or objections it may have to this action. The Credit Union intends no admission of fact, law or liability by this Notice and expressly reserves all defenses, motions, and/or pleas.

Dated: May 6, 2024

Respectfully Submitted,

/s/ Andrew J. Smith  
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*Counsel for Apple Federal Credit Union*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was filed with the CM/ECF system, and served by electronic mail and first-class mail to the following on this 6th day of May, 2024:

Wilson Ochar  
928 Manor Road; Apartment 202  
Alexandria, Virginia 22305  
Wilson.ochar@gmail.com

*Plaintiff Pro Se*

/s/ Andrew J. Smith  
Andrew J. Smith, Esq.